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Attorneys for Defendant Vigorous Shipping & Trading, S.A.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

PACIFIC GULF SHIPPING CO.,

No. 3:18-cv-02076-MO

Plaintiff,

v.

ADAMASTOS SHIPPING & TRADING
S.A., VIGOROUS SHIPPING & TRADING,
S.A., BLUE WALL SHIPPING LTD., and
PHOENIX SHIPPING & TRADING S.A.,

DEFENDANT VIGOROUS SHIPPING &
TRADING, S.A.'S SUPPLEMENTAL
RESPONSE TO PLAINTIFF'S EMERGENCY
MOTION TO EXTEND DEADLINE TO
COMPLETE DEPOSITIONS

Defendants.

Subject to its restricted appearance, Vigorous Shipping & Trading, S.A. is submitting this Supplemental Response to Plaintiff's Emergency Motion to Extend the Deadline for Depositions to advise the Court that in response to Plaintiff's counsel's claimed unavailability this weekend, it has offered to present the two witnesses for depositions beginning Thursday at mid-day through end of day Friday, December 21, 2018. Also, regarding the location of the depositions, counsel for Vigorous Shipping has proposed holding the depositions at a hotel in Athens, Greece, and counsel for Plaintiff would prefer to make arrangements to have the depositions at a law firm office, which Vigorous Shipping does not oppose.

DATED: December 18, 2018.

MILLER NASH GRAHAM & DUNN LLP

s/ Sanja Muranovic

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